

April 9, 2015

Kristine Koch
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900, M/S ECL-115
Seattle, WA 98101

Re: Lower Willamette River, Portland Harbor Superfund Site
USEPA Docket No: CERCLA-10-2001-0240
Monthly Progress Report for March 2015

Dear Ms. Koch:

This monthly status report provides information required by the Portland Harbor Superfund Site Administrative Settlement and Administrative Order on Consent (ASOC).

1. ACTIONS TAKEN IN MARCH 2015

- None.

Deliverables Approved by EPA

- None.

Deliverables Submitted to EPA and Other Actions

- On March 6, 2015, at EPA's request, the LWG provided EPA draft maps with core profiles showing depth of impact for Total polycyclic aromatic hydrocarbons (PAHs) and DDX. On March 6, 2015, the LWG provided EPA maps showing the cores with dioxin/furan data in the Sediment Decision Units (SDUs) where dioxin/furans are listed as a primary contaminant of concern (COC) in the March 27, 2014 table provided by EPA.
- On March 6, 2015, the LWG provided EPA a letter regarding the background values presented in EPA's draft Feasibility Study (FS) Section 2.
- On March 9, 2015, a meeting was held with the LWG and EPA Senior Managers.
- On March 10, 2015, the LWG provided EPA comments regarding the Oregon Department of Environmental Quality (DEQ) Source Control Summary Report consistency with EPA's draft FS Section 1 groundwater and riverbank source text.
- On March 11, 2015, a risk communications meeting was held with the LWG, EPA, and Oregon Department of Health communications staff.
- On March 12, 2015, an FS technical call was held with EPA and its partners to discuss dioxin/furan RALs.
- On March 13, 2015, the LWG requested GIS files related to EPA's dioxin/furan analysis.

- On March 17, 2015, an FS technical meeting was held with EPA and its partners to discuss the LWG's comments on EPA's draft FS Section 2.
- On March 19, 2015, a call was held with DEQ to answer questions about what information was used to create the revised comprehensive benthic risk areas (April 2014) footprint.
- On March 25, 2015, the LWG provided comments on EPA's FS revised draft Section 2.
- On March 26, 2015, the LWG provided EPA a copy of the LWG's November 5, 2014 Hardness-based Mn Criterion Memorandum and a summary of the LWG's information presented in that memorandum.
- On March 30, 2015, the LWG sent an email to EPA to clarify the number of other contaminants for which the EPA RI Section 7 dispute decision directs the LWG to calculate background values. Based on written feedback from Kristine Koch, Rick Albright's March 24, 2015 dispute decision is to be interpreted as referencing the 18 contaminants presented in Appendix D to the RI Section 5.

Comments/Documents Provided by EPA

- On March 2, 2015, EPA provided an additional erratum for the FS Section 2.
- On March 4, 2015, EPA provided the LWG a written summary of EPA staff roles and responsibilities.
- On March 5, 2015, EPA informed the LWG that the version of the Applicable or Relevant and Appropriate Requirement (ARAR) table that was provided to the LWG on February 23, 2015, did not include the latest information regarding action-specific ARARs. EPA provided a redline table that reflects the state ARARs related to removal/fill statute and regulations.
- On March 6, 2015, EPA provided the PeCDD remedial action level (RAL) curve developed by CDM Smith for EPA and the map of the areas exceeding the RALs for PeCDD, PeCDF, and TCDD. On March 10, 2015, the LWG informed EPA it provided the wrong RAL curve for PeCDD, and EPA responded later that day with revised dioxin/furan RALs (including the correct PeCDD RAL curve).
- On March 10, 2015, EPA provided additional rationale for the map of remediation areas presented in EPA's revised draft FS Section 2.
- On March 13, 2015, EPA informed the LWG that they are only using 3 dioxin/furans RALs and propose dropping the other two (HxCDF and TCDF) and Total dioxin/furan. EPA will provide the LWG the geodatabase or layer packages.
- On March 19, 2015, EPA provided the LWG a letter in response to the LWG's February 12, 2015, and March 10, 2015 comments regarding EPA's draft Section 1 of the FS.
- On March 19, 2015, EPA provided the LWG a letter in response to the LWG's February 12, 2015 comments on EPA's draft revisions to the Executive Summary to the Remedial Investigation (RI).
- On March 19, 2015, EPA provided the LWG excerpts from the National Remedy Review Board guidance.

- On March 20, 2015, EPA provided the LWG additional redline text for the RI Section 10 conceptual site model, specific to the uncertainties associated with the risk assessments.
- On March 20, 2015, EPA requested a meeting be scheduled to discuss EPA's comments on the Bioaccumulation Modeling Report.
- On March 24, 2015, EPA provided the decision on August 26, 2014, dispute regarding background for the RI Section 7.
- On March 31, 2015, EPA clarified the contaminants that the LWG needs to compute background for the RI in Appendix H based on Rick Albright's dispute decision.
- On March 31, 2015, EPA provided a copy of a January 5, 2015 email from Elizabeth Allen to Rick Albright in response to the LWG's request for a copy of the January 22, 2015 "Outlier Test for OCB Congeners" cited in Rick Albright's RI Section 7 dispute decision.

2. PROBLEMS ENCOUNTERED, ANTICIPATED DELAYS, AND SOLUTIONS

- None.

3. RESULTS OF SAMPLING, TESTS, AND OTHER DATA RECEIVED

- None.

4. SCHEDULE FOR THE NEXT FOUR MONTHS

The LWG project team will continue to coordinate with the EPA Remedial Project Managers to schedule focused technical FS subgroup meetings with representatives from the respective EPA and LWG teams, consistent with the December 19, 2014 FS revision process agreement.

The EPA and LWG technical teams will utilize Rick Albright's decision on the RI Section 7 dispute to resume discussions to finalize the RI and incorporate the background sediment information into the revised FS.

Work covered by the ASOC that is currently planned for April, May, June, and July 2015 includes the following:

- On May 18, 2015, a draft FS Section 3 is expected from EPA for LWG review.
- On July 16, 2015, a draft FS Section 4 and Executive Summary is expected from EPA for LWG review.

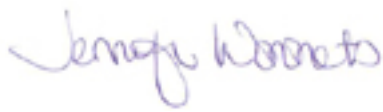
Submittal dates for pending documents currently under preparation by the LWG and scheduled for submittal in upcoming months are listed in Table 1: Status of Active LWG Deliverables—Portland Harbor RI/FS. This table includes pending and recently submitted deliverables for which EPA comments or approvals are required. Table 2: Status of LWG Deliverables—Portland Harbor RI/FS reflects the more complete list of LWG submittals and is equivalent to the former Table 1 provided in previous progress reports.

5. DOCUMENTS AND ISSUES AWAITING EPA RESPONSE

EPA comments or approvals have not been received on a number of documents that have been submitted to EPA as required by the ASOC; these submittals are listed in Tables 1 and 2. The LWG requests that EPA provide document approvals for these submittals to verify that the terms of the ASOC are being met and issues are resolved to maintain progress on the RI/FS. Also, the LWG believes that many of the documents listed as future submittals in Table 2 are no longer needed (see Status/Comments column) and requests that EPA review the list and confirm that these documents are, indeed, not needed.

If you have any questions, please give me a call at (503) 972-5014.

Sincerely,



Jennifer Woronets
LWG Administrative Project Coordinator

Copies:

- Matt McClincy, ODEQ (email only)
- Tom Gainer, ODEQ (email only)
- Rob Neely, NOAA (email only)
- Brian Cunninghame, Confederated Tribes of Warm Springs (email only)
- Rose Longoria, Confederated Tribes of Yakama Nation (email only)
- Julie Weis, Confederated Tribes of Siletz (email only)
- Audie Huber, Confederated Tribes of Umatilla (email only)
- J D Williams, Confederated Tribes of Umatilla (email only)
- Brandy Humphreys, Grand Ronde (email only)
- Kim D'Aquila, Grand Ronde (email only)
- Erin Madden, Nez Perce Tribe (email only)
- Callie Ridolfi, Ridolfi (email only)
- LWG Management
- LWG Repository

Table 1. Status of Active LWG Deliverables – Portland Harbor RI/FS.

Deliverable¹	Submittal Deadline²	Status/Comments	EPA Comments Target Date
None.			

Notes:

¹ - **Bolded Deliverables** are primary deliverables per Section XIX, Paragraph 4 of ASOC (EPA 2001a).

Unbolded Deliverables are secondary deliverables per Section XIX, Paragraph 5 of ASOC.

Italicized Deliverables do not have stipulated penalty amounts.

² - Listed Submittal Deadlines are for draft documents. Unless otherwise specified, all final documents are due to EPA 30 days following receipt of comments from EPA.

Deliverable completed and approved by EPA.

Deliverable submitted to EPA and its partners.

Underlining indicates text change from last progress report.

Table 2. Status of LWG Deliverables – Portland Harbor RI/FS.

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
Round 1			
<i>Compilation of Information for Sources Between RM 11 and 11.6 East Bank of Portland Harbor</i>	November 2007	Submitted to EPA and DEQ 11/21/2007. Need written response from DEQ and EPA that upland sources are under investigation consistent with the Road to the ROD.	
Round 2 Biota			
<i>Revised Round 2 QAPP Addendum 6: Sampling of Benthic Invertebrate Tissue</i>	11/23/2005	Submitted 11/23/2005; approved with conditions on 12/6/2005; a final QAPP addendum is required	12/8/2005
<i>Final Round 2 QAPP Addendum 6: Sampling of Benthic Invertebrate Tissue</i>	TBD	On 2/9/2006, the LWG submitted a response to EPA's comments on the 11/23/2005 version of the QAPP addendum. The LWG has not heard back from EPA on that response. The LWG believes that a final QAPP is not required. Need EPA agreement that this final QAPP is not required.	
Hydro/Sed Modeling			
<i>Phase 2 Hydrodynamic Re-calibration Report</i>	May 2009	Submitted 5/7/2009; EPA comments received 7/22/2009	
Groundwater Pathway			
<i>Draft Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan</i>	4/22/2005	Submitted 4/22/2005; EPA comments received 6/3/2005	
<i>Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan - Response to EPA Comments</i>	TBD	Outstanding issues to be addressed in GW Appendix to Draft RI Report.	
<i>Revised Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan (including Appendix A - Site Summaries and Appendix B - Pilot Study Data Report)</i>	TBD	Outstanding issues to be addressed in GW Appendix to Draft RI Report.	
<i>Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches</i>	4/29/2005	Submitted 4/29/2005; EPA comments received 6/10/2005	

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
<i>Revised Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches</i>	No longer needed	The only seep determined to pose a potentially complete exposure pathway is discharge from Outfall 22B. The existing data from Outfall 22B include the upland COIs and meet the data quality requirements for risk evaluation (Category 1/QA2). Based on the Round 2 Report evaluations, no additional seep data are needed. Therefore, this FSP is no longer needed.	
<i>Revised Round 2 Groundwater Pathway Assessment SAP Attachment 2: Transition Zone Water FSP</i>	3/27/2006	Redline version submitted 3/27/2006; EPA needs to provide final approval of this FSP. This revised FSP was prepared and submitted after the associated field work was completed.	4/28/2006
<i>Revised Round 2 Groundwater Pathway Assessment SAP Attachment 3: Supplement to QAPP Addendum 3</i>	10/7/2005	Submitted 10/7/2005: Conditional approval of proposed changes to the QAPP addendum received from EPA on 9/30/2005. EPA needs to provide final approval of this QAPP. Approval to conduct sampling was provided by EPA on 9/30/2005.	
<i>Revised Transition-Zone Water FSP Addendum 1 Sampling Plans for ExxonMobil, Siltronic, Gasco, and Arkema</i>	3/27/2006	Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 9/30/2005. This revised FSP was prepared and submitted after the associated field work was completed.	
<i>Revised Transition-Zone Water FSP Addendum 2</i>	3/27/2006	Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 10/13/2005. This revised FSP was prepared and submitted after the associated field work was completed.	
Natural Attenuation			
<i>Step 2 Natural Attenuation Evaluation Report</i>	No longer needed		
Tech Memos			
Revised TRV Selection TM	10/23/2004	Submitted; EPA comments received 3/18/2005. On 6/10/2005, EPA directed the LWG to submit the final TRV Selection TM with the PRE. The final TRV Selection TM was submitted as an appendix to the 9/9/2005 PRE.	

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
Second Revision Preliminary Risk Evaluation Approach TM	1/7/2005	Submitted; EPA comments received 3/4/2005. On 6/10/2005, EPA directed the LWG to submit the final PRE approach TM with the PRE. The final PRE Approach was submitted as an appendix to the 9/9/2005 PRE.	
Comprehensive ERA Approach TM	6/27/2004	Submitted; EPA comments received 10/1/2004	
Revised Comprehensive ERA Approach TM	TBD	In a 1/11/2006 meeting with EPA, the LWG proposed deleting this deliverable. The LWG has not heard back from EPA on this proposal. Need EPA agreement that this deliverable is no longer needed.	
Process for Derivation of PRGs TM	1/20/2005	Submitted; EPA comments received 6/30/2006; a revised tech memo is not required.	3/21/2005
<i>Draft Approach to Determining Background for the Portland Harbor Superfund Site</i>	3/3/2006	Submitted 3/3/2006; EPA comments received 6/5/2006; revised tech memo required.	5/2/2006
<i>Revised Approach to Determining Background for the Portland Harbor Superfund Site</i>	7/20/2006	The revised approach to determining background for the Portland Harbor Superfund Site will be provided in the Draft RI Report	
<i>Process for Delineating the Extent of Contamination Upstream and Downstream of the ISA</i>		The approach for Delineating the Extent of Contamination Upstream and Downstream of the ISA will be provided in the Draft RI Report	
<i>COPC Selection Interim Deliverable</i>	~1/23/2006	In a 1/11/2006 meeting with EPA, the LWG proposed deleting this deliverable. The LWG has not heard back from EPA on this proposal. Need EPA agreement that this deliverable is no longer needed.	
ECOLOGICAL RISK ASSESSMENT			
Ecological Preliminary Risk Evaluation (PRE)	9/9/2005	Submitted 9/9/2005; EPA comments received 4/28/2006, a revised PRE is not required	11/8/2005
<i>Round 2 Benthic Assessment Interpretation Report</i>	3/17/2006	Submitted 3/17/2006; EPA comments received 7/6/2006	5/16/2006
<i>Food Web Modeling Report: Evaluating Trophic Trace and the Arnot and Gobas Models for Application to the</i>	11/4/2005	Submitted 11/4/2005; EPA comments received 3/10/2006	1/3/2006

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
<i>Portland Harbor Superfund Site</i>			
<i>Revised Ecological Water Screening Levels</i>	5/26/2006	Submitted 5/25/2006; directive EPA comments received 9/15/2006, and a correction to the xylene AWQC on 9/27/06. Additional revisions were submitted on 10/13/2006.	7/9/2006
Feasibility Study			
Literature Survey of Treatability Studies	October 2007	Submitted 10/31/2007. EPA comments received 2/15/08. A revised deliverable is not required, EPA comments indicated that they should be addressed in the FS.	Jan-08
<i>Round 3B (FS) Side-scan Sonar Data Report</i>	September 2008	Submitted 5/18/2009	
<i>Treatment Technologies Screening Table</i>	Early May 2009	Submitted 6/5/2009; EPA comments received 7/9/2009	7/6/2009
<i>Screening of Disposal Facilities for the Feasibility Study Memorandum</i>	Mid May 2009	Submitted 6/18/2009; EPA comments received 7/10/2009	7/2/2009
<i>Early Preliminary Remediation Goals (PRGs)</i>	Late March 2009	Submitted 3/27/2009	
<i>Benthic Toxicity AOPCs Check In Materials</i>	September 2010	Submitted 9/07/2010	
<i>Treatment Technology Evaluation Tools Memo</i>	-	Submitted 03/15/2011; EPA comments received 4/27/2011	
<i>Draft Mitigation Determination Approach for Use in the FS Tools Memo</i>	-	Submitted 03/15/2011; EPA comments received 4/27/2011	
<i>Draft Feasibility Study Costing Approach Tools Memo</i>	-	Submitted 03/15/2011; EPA comments received 4/27/2011	
<i>Draft Identification of "COCs" and Contaminant Mobility Evaluation Criteria For the Draft FS Tools Memo</i>	-	Submitted 03/16/2011; EPA comments received 4/27/2011	
<i>Dredging Water Quality Evaluation Tools Memo</i>	-	Submitted 03/31/2011; EPA comments received 4/27/2011	
Alternatives Screening Materials		Submitted 04/06/2011	
Draft FS Key Elements Presentation	-	Submitted Materials 06/06/2011 Presentation 06/21 and 06/22/2011	

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
<i>EPA Directed Draft Feasibility Study (FS) Key Work Product</i>	01/15/2012	Submitted 01/16/2012	NA
Draft Feasibility Study (FS) - Electronic Version For Early EPA Team Review	03/20/2012	Submitted 03/20/2012 EPA draft FS Section 1 received 07/08/14 EPA Draft Final FS Section 1 and Appendix A received on 12/18/14 EPA draft FS Section 2 received 2/23/15	6/29/2012
Draft Feasibility Study (FS) - Formal Publically Accessible Submittal	03/30/2012	Submitted 03/30/2012 EPA initial comments received 12/18/2012. EPA draft FS Section 1 received 07/08/14 EPA Draft Final FS Section 1 and Appendix A received on 12/18/14 EPA draft FS Section 2 received 2/23/15	6/29/2012
General Field/Data/RI Reporting			
<i>Validated Analytical Results</i>	90 days following completion of each sampling activity		
Comprehensive Round 2 Site Characterization Summary and Data Gaps Analysis Report	2/21/2007	Submitted 2/21/2007. EPA comments on Sections 1-9 and Appendices A, B, C, D, F, and G received 1/15/08; comments on Section 10 received 3/20/08; comments on Section 11 received 5/16/08; comments on Appendix E received 8/8/08. This document was never intended to be revised or approved by EPA; comments will be addressed in the Draft RI Report.	
<i>Draft Sediment Mobility Testing Data Report</i>	August 2009	Submitted 8/11/2009	EPA comments not anticipated
Draft Baseline Ecological Risk Assessment Report	Early September 2009	Submitted 9/2/2009 Preliminary EPA comments received 12/23/09. EPA comments received 07/16/2010. EPA benthic approach comments received 09/27/2010.	11/2/2009
Draft Baseline Human Health Risk Assessment Report	Late September 2009	Submitted 9/23/2009 Preliminary EPA comments received 12/23/09. EPA comments received 07/16/2010.	11/23/2009
Draft Remedial Investigation Report	Late October 2009	Submitted 10/27/2009 EPA comments received 07/16/2010	12/27/2009

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
<i>Benthic Toxicity Reanalysis Technical Memorandum</i>	Mid November 2009	Submitted 11/13/2009 EPA benthic approach comments received 09/27/2010.	01/13/2009
<i>Supporting Electronic Information for Draft Benthic BERA</i>	November 2009	Submitted 11/19/2009	01/19/2010
Draft Final BHHRA	5/2/2011	Submitted 05/02/2011; EPA comments received 06/22/2012. EPA dispute decision received 12/07/12.	7/2/2011
Draft Final BERA	7/5/2011	Submitted 07/01/2011; EPA comments received 07/10/2012. EPA comments received on 12/21/2012. EPA comments received on 01/11/2013	9/1/2011
Human Health and Ecological Risk Management Recommendations	July 2011	Submitted 07/22/2011	9/22/2011
Draft Final Remedial Investigation Report	8/29/2011	Submitted 08/29/2011; EPA comments received on Section 1 and 2, Appendices A and H 11/30/2012 EPA comments received on Section 3 02/21/2013 EPA comments received on Section 4 03/19/2013 EPA comments received on Section 8 04/19/2013 EPA comments received on Section 9 8/16/2013 Revised Redline of EPA comments received on Section 9 9/26/2013 EPA comments received on Section 7 11/05/2013 Additional EPA comments received on Section 7 12/19/2013 EPA comments received on Section 6 05/07/2014 EPA comments received on Section 5 6/11/14 EPA comments received on Section 10 and 11 7/10/2014 EPA comments received on the Executive Summary 01/13/2015	10/29/2011
Final BHHRA	3/28/2013	Submitted: 02/11/2013 EPA comments received 02/15/2013 EPA conditional approval received on 02/26/2013.	4/8/2013

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
		Final BHHRA posted and hardcopy submitted 03/25/13. EPA provided final approval of the BHHRA on 04/03/13 Final BHHRA errata posted 04/12/13.	
Final BERA	4/1/2013	Submitted: 04/01/2013; EPA comments received 06/07/13; Revised draft submitted to EPA 06/14/13 EPA comments received 06/26/13 EPA comments received 09/26/13 Further revised draft submitted to EPA 10/10/13 Further revised draft submitted to EPA 12/16/13 EPA provided final approval of the BERA with the exception of Attachment 1 Part B Communication Log on 12/20/13	4/15/2013
STORMWATER			
<i>Stormwater Loading Check-in Materials</i>	2/1/2009	Submitted 2/18/2009; EPA comments received 5/6/2009	
<i>Revised Stormwater Loading Calculation Methods</i>	April 2010	Submitted 04/30/2010; EPA comments received 08/17/2010	6/30/2010
<i>Final Stormwater Loading Calculation Methods</i>		Submitted 01/31/2011; EPA comments received 03/02/2011 Revised Report Submitted 04/15/2011	3/31/2011
SEDIMENT			
<i>Round 3B Field Sampling Plan: Sediment Sampling and Benthic Toxicity Testing</i>		Submitted 5/4/2007; EPA comments received 7/25/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
<i>Upriver and Multnomah Channel Sediment Evaluation and Field Sampling Plan Technical Approach</i>		Submitted 5/25/2007; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
<i>Draft Round 3B Surface and Core Sediment FSP Preliminary Technical Memorandum</i>		Submitted 5/25/2007; EPA comments received 8/9/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
<i>Draft Round 3B Erosion Core Sediment FSP Technical Memorandum</i>	August 2007	Submitted 8/29/07; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
<i>Round 3B QAPP Addendum 10 for Sediment Sampling</i>	November 2007	Submitted 12/17/2007. Need EPA approval of this QAPP Addendum.	
<i>Round 3 Sediment Trap Deployment Field Report</i>		Submitted 06/30/2011	
FATE & TRANSPORT			
<i>Draft Chemical Fate & Transport Model Development and Data Gaps Identification Report</i>	July 2007	Submitted 7/20/2007; EPA comments received 10/15/07. LWG response to comments submitted 1/8/2008.	
<i>F&T Surface Sediment FSP – Addendum to 3B Sediment FSP</i>	December 2007	Submitted 12/10/2007; EPA comments received 1/2/08. 1/16/08 LWG agreed with EPA not to perform the sampling. Need EPA agreement that this deliverable is no longer needed.	
<i>Draft Bioaccumulation Modeling Report</i>		Submitted 7/27/2009	
CULTURAL RESOURCES			
<i>Draft Cultural Resource Survey Report</i>	12/16/2005	Submitted 12/16/2005	2/14/2006; EPA comments not time-critical at this point in the project
BIOLOGICAL ASSESSMENT			
<i>Preliminary Draft Site-Wide Biological Assessment - Electronic Version For Early EPA Team Review</i>	3/30/2012	Submitted 03/20/2012	6/29/2012
<i>Preliminary Draft Site-Wide Biological Assessment - Formal Publically Accessible Submittal</i>	3/30/2012	Submitted 03/30/2012	6/29/2012

Notes:

¹ - **Bolded Deliverables** are primary deliverables per Section XIX, Paragraph 4 of ASOC (EPA 2001a).

Unbolded Deliverables are secondary deliverables per Section XIX, Paragraph 5 of ASOC.

Italicized Deliverables do not have stipulated penalty amounts.

² - Listed Submittal Deadlines are for draft documents. Unless otherwise specified, all final documents are due to EPA 30 days following receipt of comments from EPA.

Only deliverables due within the next four months are shown.

Deliverable completed and approved by EPA.

Deliverable submitted to EPA and its partners.

Underlining indicates text change from last progress report.